

TECHNICAL BASIS FOR TIER I OPERATING PERMIT

DATE: August 27, 2002

PERMIT WRITER: Kent Berry

PERMIT COORDINATOR: Bill Rogers

SUBJECT: *TECHNICAL ANALYSIS FOR TIER I OPERATING PERMIT*
AIRS Facility No. 021-00002, Louisiana Pacific Corp., Bonners Ferry
Final Tier I Operating Permit

Permittee:	Louisiana Pacific Corp.
Permit Number:	021-00002
Standard Industrial Classification:	2421
Description:	Lumber production
Kind of Products:	Kiln-dried dimensional lumber
Responsible Official:	Bruce Mallory, Lumber General Manager
Person to Contact:	Jim Perry, Plant Manager
Telephone Number:	(208) 267-3162
# of Full-time Employees	100
Area of Operation:	80 acres
Facility Classification:	A
County:	Boundary
Air Quality Control Region:	63
UTM Coordinates:	549.8, 5393.6
Exact Plant Location:	6726 Riverside, Bonners Ferry, Idaho

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LIST OF ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ, Department	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U. S. Environmental Protection Agency
°F	degree Fahrenheit
gal	gallon
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
HAPs	hazardous air pollutants
hr/yr	hours per year
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
LPG	liquid propane gas
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
Mbf	thousand board feet
MMbdf	million board feet
MMbdf/yr	million board feet per year
MMBtu/hr	million British thermal units per hour
mmHg	millimeters of mercury
NAAQS	National Ambient Air Quality Standards
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
O ₂	oxygen
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
SIP	State Implementation Plan
SIC	Standard Industrial Classification
scf	standard cubic feet
scfm	standard cubic feet per minute
SO ₂	sulfur dioxide
T/yr	tons per year
VOC	volatile organic compound

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this Tier I operating permit in accordance with IDAPA 58.01.01.362, *Rules for the Control of Air Pollution in Idaho*.

On behalf of the DEQ, Environmental Quality Management, Inc. (EQ) has reviewed the information provided by the Louisiana Pacific Corp. (LP) regarding the operation of the LP-Bonnors Ferry facility (formerly owned by Crown Pacific Limited Partnership) located in Bonners Ferry, Idaho. This information was submitted on the requirements of the Tier I operating permit in accordance with IDAPA 58.01.01.300.

Based on the information submitted, EQ has drafted a Tier I operating permit for LP. The permit has been submitted for facility review and for public comment. The public comment period was held from April 12, 2002 to May 13, 2002. No comments were received from any party. A proposed permit was developed and submitted to EPA Region 10 as required by IDAPA 58.01.01.366. EPA provided no written objections to the proposed permit.

2. SUMMARY OF EVENTS

On June 22, 1995, DEQ received a Tier I operating permit application from Crown Pacific for their dimensional lumber manufacturing facility located in Bonners Ferry, Idaho. Revised application pages were received on December 13, 1999. On February 11, 2000, DEQ sent an incompleteness letter requesting additional information. Crown Pacific submitted responses dated February 14, 2000 and March 2, 2000. On October 15, 2001, LP notified DEQ that it had acquired the Bonners Ferry facility effective September 28, 2001 and identified a new responsible official for the facility. A public comment period was held from April 12, 2002 to May 13, 2002. No comments were received. A proposed permit was submitted to EPA Region 10 on June 24, 2002.

3. BASIS OF THE ANALYSIS

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- Tier I operating permit application, dated June 6, 1995; and supplemental application materials dated 12/1/99, 2/14/00, 3/2/00, and 10/15/01
- Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Office of Air Quality Planning and Standards, EPA
- Guidance developed by the EPA and DEQ
- Title V permits issued by DEQ for similar sources

4. REGULATORY ANALYSIS – GENERAL FACILITY

4.1 Facility Description

LP-Bonnors Ferry produces dried dimension lumber. The primary pollutants emitted are PM and VOC's. The potential VOC emissions exceed 100 tons/year, thereby classifying the facility as a Tier I major facility in accordance with IDAPA 58.01.01.008.10.

The primary emission sources are: two natural gas-fired boilers, which produce steam to heat the lumber-drying kilns; multiple lumber-drying kilns; a planer shavings bin baghouse; wood byproduct storage and handling (fugitive emissions); and debarking and bark hog operations.

Logs are first debarked in the debarking area, where bark is peeled from the logs by the debarkers. Bark from the debarker is processed through a hog where it is shredded and then conveyed to a storage and truck loading bin. Wood-waste products are not burned at the facility.

Debarked logs enter the sawmill where they are cut into dimensional lumber. Sawdust from the sawmill is transferred via covered belt conveyor to a sawdust storage and truck loading bin. The edge waste from the logs is processed through a chipper or a cutting chipper and passed through a screen. Material from the cutting chipper is separated. All chips are transferred via conveyor to the top of the surge bin. From here, the chips are screened and conveyed underground to a chip railroad car loadout. Fines from the screen are conveyed to the sawmill where they are combined with the sawdust.

Lumber is sorted, stacked, and then dried in the steam-heated dry kilns. Each kiln has numerous roof vents from which hot air is exhausted to maintain a specified temperature within each kiln. Particulate matter and naturally occurring VOCs from the wood are the only pollutants exiting the kilns. On occasion, lumber is sorted by hand and dried outdoors.

The planer mill receives dried lumber from the kilns. The planing mill consists of a screen, planer fines chipper, planer chips chipper, and a hog. The lumber is planed and trimmed to proper dimensional size. Trimmed ends are chipped and transferred pneumatically to the surge bin. Shavings from the planer are transferred pneumatically to the planer shavings cyclone on the planer shavings storage and truck loading bin.

The finished dimensional lumber is sorted, graded, stacked, wrapped, and stored until it can be shipped out by truck or rail car.

4.2 Facility Classification

This facility is classified as a major facility, in accordance with IDAPA 58.01.01.008.10, because it emits, or has the potential to emit, a regulated air pollutant in excess of 100 T/yr. This facility is not a designated facility as defined by IDAPA 58.01.01.006.27, nor is it subject to PSD permitting requirements because it does not emit, or have the potential to emit, a regulated air pollutant in excess of 250 T/yr. This facility is not subject to NSPS requirements (40 CFR 60), NESHAP requirements (40 CFR 61), or a specific MACT requirement (40 CFR 63). The facility's SIC is 2421, and the AIRS facility classification is A.

4.3 Area Classification

The facility is located in Boundary County, which is located within AQCR 63. The area is classified as attainment or unclassifiable for all federal and state criteria air pollutants. There are no Class I areas within 10 km of the facility.

4.4 Permitting History

On November 24, 1997, a PTC was issued covering the following sources: two natural gas-fired boilers replacing wood-fired boilers; five wood-waste cyclones; and five drying kilns. On March 20, 1998, the PTC was modified to revise the emission limits for the boilers and the shavings bin cyclone. On August 19, 1999, a PTC was issued for a baghouse following the planer shavings bin cyclone. On October 26, 1999, the PTC was modified for the addition of new drying kilns and an increase in production capacity. Although there were no changes to the planer shavings bin baghouse, the emission limit for the baghouse was substantially reduced in the October 26, 1999 PTC revision. In a parallel action with this Tier I permit, the emission limit for the planer shavings bin baghouse is being revised to reflect a more realistic outlet grain loading from the baghouse.

4.5 Facility-wide Applicable Requirements

4.5.1 Rules for Control of Fugitive Dust - IDAPA 58.01.01.650-651

Permit Condition 1.1 states all reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

4.5.1.1 Compliance Demonstration

Permit Condition 1.2 states the permittee is required to monitor and maintain records of the frequency and the methods used by the facility to reasonably control fugitive particulate emissions. IDAPA 58.01.01.651 gives some examples of ways to reasonably control fugitive emissions which include use of water or chemicals, applying dust suppressants, using control equipment, covering trucks, paving roads or parking areas, and removing materials from streets.

Permit Condition 1.3 requires the permittee maintain a record of all fugitive dust complaints received. In addition, the permittee is required to take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The permittee is also required to maintain records that include the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

To ensure that the methods being used by the permittee to reasonably control fugitive particulate matter emissions whether or not a complaint is received, Permit Condition 1.4 requires the permittee conduct periodic inspections of the facility. The permittee is required to inspect potential sources of fugitive emissions during

daylight hours and under normal operating conditions. If the permittee determines that the fugitive emissions are not being reasonably controlled the permittee shall take corrective action as expeditiously as practicable. The permittee is also required to maintain records of the results of each fugitive emission inspection.

Permit Conditions 1.3 and 1.4 require the permittee to take corrective action as expeditiously as practicable. In general, the Department believes that taking corrective action within 24 hours of receiving a valid complaint or determining that fugitive particulate emissions are not being reasonably controlled meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

4.5.2 Rules for the Control of Odors - IDAPA 58.01.01.775-776

General Provision 28 and IDAPA 58.01.01.776 both state: "*No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids to the atmosphere in such quantities as to cause air pollution.*" This condition is currently considered federally enforceable until such time it is removed from the SIP, at which time it will be a state-only enforceable requirement.

4.5.2.1 Compliance Demonstration

General Provision 29 requires the permittee maintain records of all odor complaints received. If the complaint has merit, the permittee is required to take appropriate corrective action as expeditiously as practicable. The records are required to contain the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

General Provision 29 requires the permittee take corrective action as expeditiously as practicable. In general, the Department believes that taking corrective action within 24 hours of receiving a valid odor complaint meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

4.5.3 Visible Emissions - IDAPA 58.01.01.625

IDAPA 58.01.01.625 and Permit Condition 1.5 state: "*(No) person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined . . .*" by IDAPA 58.01.01.625. This provision does not apply when the presence of uncombined water, NO_x, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this rule.

4.5.3.1 Compliance Demonstration

To ensure reasonable compliance with the visible emissions rule, Permit Condition 1.6 requires that the permittee conduct routine visible emissions inspections of the facility. The permittee is required to inspect potential sources of visible emissions, during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emission covered by this section, the permittee must take appropriate corrective action as expeditiously as practicable. If opacity is determined to be greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee must take corrective action and report the exceedance in its annual compliance certification and in accordance with the excess emissions rules in IDAPA 58.01.01.130-136. The permittee is also required to maintain records of the results of each visible emissions inspection which must include the date of each inspection, a description of the permittee's assessment of the conditions existing at the time visible emissions are present, any corrective action taken in response to the visible emissions, and the date corrective action was taken.

It should be noted that if a specific emission unit has a specific compliance demonstration method for visible emissions that differs from Permit Condition 1.6, then the specific compliance demonstration method overrides Permit Condition 1.6.

Permit Condition 1.6 requires the permittee take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of discovering visible emissions meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

4.5.4 Excess Emissions

Permit Condition 1.7 requires the permittee comply with the requirements of IDAPA 58.01.01.130-136 for startup, shutdown, scheduled maintenance, safety measures, upset, and breakdowns. This section is fairly self explanatory and no additional detail is necessary in this technical analysis. It should; however, be noted that

subsections 133.02, 133.03, 134.04, and 134.05 are not specifically included in the permit as applicable requirements. These provisions only apply if the permittee anticipates requesting consideration under subsection 131.02 to allow DEQ to determine if an enforcement action to impose penalties is warranted. Section 131.01 states . . . "The owner or operator of a facility or emissions unit generating excess emissions shall comply with Sections 131, 132, 133.01, 134.01, 134.02, 134.03, 135, and 136, as applicable. If the owner or operator anticipates requesting consideration under Subsection 131.02, then the owner or operator shall also comply with the applicable provisions of Subsections 133.02, 133.03, 134.04, and 134.05." Failure to prepare or file procedures pursuant to Sections 133.02 and 134.04 is not a violation in and of itself, as stated in subsections 133.03.a and 134.06.b. Therefore, since the permittee has the option to follow the procedures in Subsections 133.02, 133.03, 134.04, and 134.05; and is not compelled to, the subsections are not considered applicable requirements for the purpose of this permit and are not included as such.

4.5.4.1 Compliance Demonstration

The compliance demonstration is contained within the text of Permit Condition 1.7. No further clarification is necessary here.

5. EMISSIONS UNITS

The permit is structured to include five emission units, three of which have specific applicable requirements from previous PTC's.

Because process weight requirements (IDAPA 58.01.01.703) are applicable to an entire process, for the purpose of this permit it was determined that three operations are affected by the process weight rules. Since a process is a series of actions or operations leading to an end result, it was determined that only one process exists in the production of dimensional lumber. However, for each operation the applicable requirements in regards to PM are the process weight rules IDAPA 58.01.01.701-702. The operations are:

- Wood byproduct handling and storage
- Debarking and bark hog

Each operation consists of one or more emissions units that have been grouped together due to similar functions and have similar applicable requirements.

The emissions unit groups (EUG) are listed in the permit as follows:

- EUG 1 – Gas-fired boilers 1 and 2
- EUG 2 – Lumber-drying kilns (10)
- EUG 3 – Planer shavings bin baghouse
- EUG 4 - Wood byproduct handling and storage
- EUG 5 – Debarking and bark hog

A discussion of the individual emissions units and the operations, as well as the regulatory requirements and methods to determine compliance, are described in more detail below.

5.1 EUG 1 - NATURAL GAS-FIRED BOILERS

The facility uses two natural gas-fired boilers to provide process steam and building heating needs. The boilers were constructed in 1997. Each boiler is rated at 31.5 MMBtu/hr, both are fueled exclusively with natural gas, and both operate continuously (i.e. 8,760 hr/yr). Combustion product emissions are uncontrolled.

The stack parameters for the boilers reported in the application are as follows:

Stack height	40 feet
Stack diameter	2 feet
Stack gas flow rate	15,000 acfm
Stack gas temperature	800°F

5.1.1 Permit Requirement - Fuel Burning Equipment - IDAPA 58.01.01.676

IDAPA 58.01.01.676 states: "a person shall not discharge to the atmosphere from any fuel burning equipment with a maximum rated input of less than 10 MMBtu/hr or more, and commencing operation on or after October 1, 1979, particulate matter excess of the concentrations shown in the following table:"

Fuel Type	Allowable Particulate Emissions	Percent O ₂
Gas	0.015 gr/dscf	3%

The effluent gas volume shall be corrected to the oxygen concentration shown.

These boilers commenced operation after October 1979 and, therefore, are subject to the requirements of IDAPA 58.01.01.676.

5.1.1.1 Compliance Demonstration Method

EPA's guidance on periodic monitoring states that "...if some level of control is necessary to comply with the standard, then the permit must either specify frequent measurement of particulate matter and/or collection of control equipment parameters to assure proper operation and maintenance of the control device." The EPA criteria are considered for the development of adequate monitoring and recordkeeping requirements for the facility's compliance certification.

The permittee shall conduct monthly observances of visible emissions from the boilers. An O&M manual shall be developed within 60 days of issuance of this permit, and shall include, at a minimum, a general description of the equipment; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; and upset conditions guidelines; and the corrective action procedures.

Continuous compliance may be established by following procedures established by the O&M manual, which the permittee shall develop following issuance of the Tier I operating permit, and by the monthly visible emissions observations. In other words, if the boiler is properly operated and inspected, the grain loading standard will not be exceeded.

5.1.1.2 Monitoring

Visible emission observations shall be conducted monthly. A compliance test is also required to demonstrate compliance with IDAPA 58.01.01.676.

5.1.1.3 Testing

At the applicant's request, the permittee shall conduct a compliance test on each boiler stack within 3 months after issuance of the permit to demonstrate compliance with this requirement.

5.1.1.4 Recordkeeping

The results of each observation shall be recorded and maintained as required in General Provision 30.

5.1.1.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report. A certification of the compliance status must be submitted annually.

5.1.2 Permit Requirement – Emission Limits (PTC No. 021-00002, 10/26/99)

Appendix A to PTC No. 021-00002, dated October 26, 1999, states that emissions from each boiler stack shall not exceed the following:

Table 5.1.2 Natural Gas-fired Boiler Emissions Summary

PM		PM ₁₀		CO		NO _x		VOC	
lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
0.91	3.98	0.91	3.98	4.87	21.35	4.87	21.35	0.38	1.65

5.1.2.1 Compliance Demonstration Method

EPA's guidance on periodic monitoring states that "...if some level of control is necessary to comply with the standard, then the permit must either specify frequent measurement of particulate matter and/or collection of

control equipment parameters to assure proper operation and maintenance of the control device." The EPA criteria are considered for the development of adequate monitoring and recordkeeping requirements for the facility's compliance certification.

The permittee shall conduct monthly observances of visible emissions from the boilers. An O&M manual shall be developed within 60 days of issuance of this permit, and shall include, at a minimum, a general description of the equipment; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; and upset conditions guidelines; and the corrective action procedures.

Continuous compliance may be established by following procedures established by the O&M manual, which the permittee shall develop following issuance of the Tier I operating permit, and by the monthly visible emissions observations. In other words, if the boiler is properly operated and inspected, the grain loading standard will not be exceeded.

5.1.2.2 Monitoring

Visible emission observations shall be conducted monthly.

5.1.2.3 Testing

At the applicant's request, the permittee shall conduct a source test on each boiler stack within 3 months after issuance of the permit to demonstrate compliance with the PM and PM₁₀ requirements.

5.1.2.4 Recordkeeping

The results of each observation shall be recorded and maintained as required in General Provision 30.

5.1.2.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report. A certification of the compliance status must be submitted annually.

5.1.3 Permit Requirement - Visible Emissions - (IDAPA 58.01.01.625)

The visible emissions limitations in IDAPA 58.01.01.625 state that a person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625.

5.1.3.1 Compliance Demonstration Method

To demonstrate compliance with the visible emissions requirements of IDAPA 58.01.01.625, the permittee shall conduct monthly 1-minute observations of each affected emission point, or source, using EPA Method 22 (in 40 CFR Part 60, Appendix A). If visible emissions are observed for any emission point, a 6-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in Permit Condition 8.30.

5.1.3.2 Monitoring

The permittee will monitor, on a monthly basis, emissions from the boilers by performing a visible emissions evaluation on the boiler stack.

A visible emissions evaluation performed during a performance test will qualify as a visible emissions evaluation for that month.

5.1.3.3 Testing

There is no testing required to satisfy the visible emissions requirement.

5.1.3.4 Recordkeeping

The permittee is required to maintain records of each monthly visible emissions evaluation performed on the boilers.

Standard requirements for recordkeeping of monitoring information must include the items listed below:

- Date of observation
- Time of observation
- Equipment/emission point observed
- Weather conditions during observation
- Results of visible emissions tests

5.1.3.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report.

5.2 EUG 2 - LUMBER DRYING KILNS

Emissions Unit Group 2 consists of 10 steam-heated lumber-drying kilns. There are no control devices on the kilns.

The kilns use steam heat from the boilers to dry the lumber. Each kiln has numerous roof vents. Emissions of PM and VOC from the kilns are uncontrolled.

The kilns are used to dry green lumber at a maximum permitted rate of 219 MMbdf/yr.

5.2.1 Permit Requirement – PM₁₀ and VOC Emission Limits (PTC No. 021-00002, 10/26/99)

Appendix A to PTC 021-00002 dated October 26, 1999 states that emissions from the kiln stacks in aggregate shall not exceed the following:

Table 5.2.1 Lumber-drying Kilns Allowable Emissions Summary

PM ₁₀		VOC
lb/hr	T/yr	T/yr
4.75	20.8	164

5.2.1.1 Compliance Demonstration Method

EPA's guidance on periodic monitoring states that *"...if some level of control is necessary to comply with the standard, then the permit must either specify frequent measurement of particulate matter and/or collection of control equipment parameters to assure proper operation and maintenance of the control device."* The EPA criteria are considered for the development of adequate monitoring and recordkeeping requirements for the facility's compliance certification.

The permittee shall conduct weekly observances of visible emissions from the drying kilns.

5.2.1.2 Monitoring

The permittee shall conduct weekly 1-minute observations of each affected emission point, or source, using EPA Method 22 (in 40 CFR Part 60, Appendix A). If visible emissions are observed for any emission point, a 6-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in General Provision 30.

5.2.1.3 Testing

There is no testing required to satisfy the PM requirement.

5.2.1.4 Recordkeeping

The results of each observation shall be recorded and maintained as required in General Provision 30, and shall include, but not limited to, the following information:

- Date of observation
- Time of observation
- Equipment/emission point observed
- Weather conditions during observation
- Results of visible emissions observations

5.2.1.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report. A certification of the compliance status must be submitted annually.

5.2.2 Permit Requirement - Visible Emissions - (IDAPA 58.01.01.625)

The visible emissions limitations in IDAPA 58.01.01.625 state: "a person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625."

5.2.2.1 Compliance Demonstration Method

The permittee shall monitor and record the results of each weekly visible emissions observation.

5.2.2.2 Monitoring

An observer shall observe emissions from each kiln vent weekly.

5.2.2.3 Testing

There are no testing requirements associated with establishing compliance with IDAPA 58.01.01.625.

5.2.2.4 Recordkeeping

The permittee will record the results of the observer's inspection of drying kiln vent emissions and provide documentation in records according to the content and format listed below:

- Date of observation
- Time of observation
- Equipment/emission point observed
- Results of visible emissions tests

The permittee must record the results of each weekly and quarterly visible emissions evaluation performed on each drying kiln vent emissions according to the standard requirements for recordkeeping of monitoring information. The record must be maintained in accordance with General Provision 30.

5.2.2.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report.

5.2.3 Permit Requirement – Process Weight Rate Limitations – (IDAPA 58.01.01.701 and 702)

Particulate matter process weight rate limitations apply to the lumber drying kilns as applicable requirements. The following calculations establish the lumber drying kilns process weight and the corresponding PM emissions limitation.

$$(32 \text{ lb/cf}^1) \times (0.0625 \text{ cf/bf}^2) \times (219 \text{ MMbf/yr}^3) \times (8760 \text{ hr/yr}) = 50,000 \text{ lb/hr} = \text{process weight.}$$

¹ AP-42, Appendix A, density of Douglas fir (representative density for all lumber species)

² conversion from 1 board foot (bf), 3/4 inch basis, to 1 cubic foot (cf)

³ throughput limitation established by PTC No. 021-00002, October 26, 1999

The PM process weight limitation for sources constructed on or after October 1, 1979, and having a process weight above 9,250 lb/hr, is determined using the following equation (IDAPA 58.01.01.701):

$$E = 1.10(PW)^{0.25}$$

$$E = 1.10(50000)^{0.25}$$

$$E = 16.45 \text{ lb PM/hr.}$$

The PM process weight limitation for sources constructed before October 1, 1979, and having a process weight above 17,000 lb/hr, is determined using the following equation (IDAPA 58.01.01.702):

$$E = 1.12(PW)^{0.27}$$

$$E = 1.12(50000)^{0.27}$$

$$E = 20.79 \text{ lb PM/hr.}$$

The allowable PM emissions from the lumber drying kilns is 4.75 lb/hr, expressed as PM₁₀. This limitation is established by PTC No. 021-00002 (October 26, 1999), is imposed to demonstrate compliance with the PM₁₀ NAAQS, and was developed using DEQs Emission Factor Guide for the Wood Products Industry. Because the applicable regulation (IDAPA 58.01.01.701 and 702) establishes limitations for PM, not PM₁₀, PM emissions from the lumber drying kilns had to be determined. The following calculation estimates the PM emissions from the lumber drying kilns for comparison purposes. Please note, the same emission factor source and throughput limit are used in the calculation.

$$(0.33 \text{ lb PM/Mbf}) \times (219 \text{ MMbf/yr}) \times (1 \text{ yr}/8760 \text{ hr}) = 8.25 \text{ lb PM/hr} = \text{potential PM emissions.}$$

The emission estimate above is the potential to emit for the lumber drying kilns because throughput to the kilns is limited by PTC No. 021-00002 (October 26, 1999). Assuming compliance is demonstrated with the throughput limit, the PM process weight limitations will never be exceeded as is evident when comparing the potential to emit to the process weight limitations (IDAPA 58.01.01.701 and 702).

5.2.3.1 Compliance Demonstration Method

Monitoring and recordkeeping of throughput is the compliance demonstration method for the applicable PM process weight limitations (IDAPA 58.01.01.701 and 702).

5.2.3.2 Monitoring

The permittee shall monitor the throughput (in board feet per month) to the lumber drying kilns once per month.

5.2.3.3 Testing

There are no testing requirements for this condition.

5.2.3.4 Recordkeeping

The permittee shall record the throughput to the lumber drying kilns monthly and annually. This information shall be recorded as board feet per month (bf/mo) and board feet per year (bf/yr). This information shall be kept at the facility for the most recent five-year period, and shall be made available to DEQ representatives upon request.

5.2.3.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report.

5.2.4 Permit Requirement – Throughput – (PTC No. 021-00002, 10/26/99)

Condition 2.1 of PTC 021-00002 dated October 26, 1999 states that the maximum throughput of dimensional lumber to the facility lumber drying kilns shall not exceed 219 MMbdf/yr.

5.2.4.2 Compliance Demonstration Method

Compliance shall be determined by monitoring and recordkeeping throughput.

5.2.4.3 Monitoring

The permittee shall monitor the throughput (in board feet per month) to the lumber drying kilns once per month.

5.2.4.4 Testing

There are no testing requirements for this condition.

5.2.4.5 Recordkeeping

The permittee shall record the throughput to the lumber drying kilns monthly and annually. This information shall be recorded as board feet per month and board feet per year. This information shall be kept at the facility for the most recent five-year period, and shall be made available to DEQ representatives upon request.

5.2.4.6 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report.

5.3 EUG 3 - CYCLONES AND BAGHOUSE

Emissions Unit Group 3 consists of four cyclones and a baghouse as follows:

Table 5.3 Emissions Units and Exhaust Gas Flow rates

Emissions Unit(s)/Process(es)	Exhaust Gas Flow rate (scfm)
Surge bin sawmill chips cyclone	4,000
Surge bin cutting chips cyclone	2,400
Planer chipper cyclone	16,000
Surge bin planer chip cyclone	3,600
Planer shavings bin baghouse	30,000

5.3.1 Permit Requirement - Process Weight - (IDAPA 58.01.01.701 and 702)

Process weight rate limitations apply to the cyclones and baghouse identified in this section. The applicable regulations are IDAPA 58.01.01.701 and 702. Throughput to these emissions units is limited by PTC No. 021-00002 (October 26, 1999). The process weight, based on the throughput limit, was determined in section 5.2.3 above. The applicable process weight limitations are therefore the same as those determined in the same section. In order to determine compliance with process weight, the chip cyclones are considered to be one process, the planer cyclones are one process, and the shavings bin baghouse is one process. Emissions from chip cyclones need to be added together as do emissions from planer cyclones for compliance demonstration purposes.

Emissions from the cyclones were estimated using flow rates obtained from the LPs 1995 Tier I operating permit application, and emission factors from DEQs Emission Factor Guide for the Wood Products Industry. The following sample calculation estimates cyclone emissions based on a grain-loading emission factor:

$$(0.03 \text{ gr/scf}) \times (4,000 \text{ scf/min}) \times (60 \text{ min/hr}) \times (1 \text{ lb/7,000 gr}) = 1.03 \text{ lb PM/hr.}$$

The baghouse manufacturer guarantees PM emissions will not exceed 0.005 gr/scf. In terms of a pound per hour emission rate, the grain-loading guarantee is determined by the following:

$$(0.005 \text{ gr/scf}) \times (30,000 \text{ scf/min}) \times (60 \text{ min/hr}) \times (1 \text{ lb/7,000 gr}) = 1.29 \text{ lb PM/hr.}$$

The following table compares potential emissions to the process weight limitation.

EMISSIONS UNIT	PM EMISSIONS (PTE) lb/hr	COMBINED PROCESS PTE lb/hr	IDAPA 58.01.01.701 lb/hr	IDAPA 58.01.01.702 lb/hr
Surge bin sawmill chips cyclone	1.03	1.65	16.45	20.79
Surge bin cutting chips cyclone	0.62			
Planer chipper cyclone	4.12	5.05	16.45	20.79
Surge bin planer chip cyclone	0.93			
Planer shavings bin baghouse	1.29	1.29	16.45	20.79

As shown above, potential cyclone and baghouse emissions will never exceed process weight limitations so long as throughput is not exceeded. In order to assure the baghouse meets its grain-loading guarantee, the operating

permit requires the permittee develop an Operations and Maintenance manual, based on manufacturer specification, and maintains operations within the designated operating parameters.

5.3.1.1 Compliance Demonstration Method

Monitoring and recordkeeping of throughput to the planers is the compliance demonstration method for the applicable PM process weight limitations (IDAPA 58.01.01.701 and 702).

In addition, the permittee is required to conduct weekly observances of visible emissions from the cyclones. Continuous compliance with process weight limitations may be established through the weekly visible emission inspection program. Generally, the process weight rule is not very stringent, so an intensive program that demonstrates compliance with the throughput and opacity limits should adequately ensure compliance with the process weight rule.

5.3.1.2 Monitoring

The permittee shall monitor the throughput (in board feet per month) to the planers once per month.

In addition, the permittee is required to conduct weekly one-minute observations of each affected emissions point or source using EPA Method 22 (in 40 CFR Part 60, Appendix A). If visible emissions are observed for any emissions point, a six-minute observation using EPA Method 9 shall be conducted. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in General Provision 30.

5.3.1.3 Testing

There is no testing required to satisfy the PM requirement.

5.3.1.4 Recordkeeping

The permittee shall record the throughput to the planers monthly and annually. This information shall be recorded as board feet per month and board feet per year. This information shall be kept at the facility for the most recent five-year period, and shall be made available to DEQ representatives upon request.

In addition, the results of each visible emissions observation shall be recorded and maintained as required in General Provision 30, and shall include, but not limited to, the following information:

- Date of observation
- Time of observation
- Equipment/emissions point observed
- Weather conditions during observation
- Results of visible emissions tests

5.3.1.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report. A certification of the compliance status must be submitted annually.

5.3.2 Permit Requirement – Planer Shavings Bin Baghouse (PTC No. 021-00002, June 21, 2002)

Permit to Construct No. 021-00002 is being administratively amended in parallel with this action. The permit limits PM₁₀ emissions from the planer shavings bin baghouse to 1.29 lb/hr or 5.63 T/yr.

Compliance with the emissions rate limits is demonstrated by maintaining the pressure drop across the planer shavings bin baghouse within the manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

5.3.2.1 Compliance Demonstration Method

EPA's guidance on periodic monitoring states that *"...if some level of control is necessary to comply with the standard, then the permit must either specify frequent measurement of particulate matter and/or collection of control equipment parameters to assure proper operation and maintenance of the control device."* EPA criteria

are considered for the development of adequate monitoring and recordkeeping requirements for the facility's compliance certification.

The permittee shall conduct weekly observances of visible emissions from the baghouse. A baghouse O&M manual shall be developed within 60 days of issuance of this permit, and shall include, at a minimum, a general description of the equipment; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; and upset conditions guidelines; and the corrective action procedures.

5.3.2.2 Monitoring

The permittee shall conduct weekly 1-minute observations of each affected emission point or source using EPA Method 22 (in 40 CFR Part 60, Appendix A). If visible emissions are observed a 6-minute observation using EPA Method 9 shall be conducted. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in Permit Condition 1.11.

The pressure drop across the shavings bin baghouse shall be monitored and recorded once weekly. The most recent five years' compilation of data shall be kept on site and shall be available to DEQ representatives upon request.

5.3.2.3 Testing

There is no testing required to satisfy the PM requirement.

5.3.2.4 Recordkeeping

The results of each visible emissions observation shall be recorded and maintained as required in General Provision 30, and shall include, but not limited to, the following information:

- Date of observation
- Time of observation
- Equipment/emission point observed
- Weather conditions during observation
- Results of visible emissions tests

5.3.2.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report. A certification of the compliance status must be submitted annually.

5.3.3 Permit Requirement - Visible Emissions - (IDAPA 58.01.01.625)

The visible emissions limitations in IDAPA 58.01.01.625 state: *"a person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625."*

5.3.3.1 Compliance Demonstration Method

The permittee shall monitor and record each weekly visible emission observation.

5.3.3.2 Monitoring

The permittee shall conduct a weekly visible emission observation.

5.3.3.3 Testing

There are no testing requirements associated with establishing compliance with IDAPA 58.01.01.625.

5.3.3.4 Recordkeeping

The permittee will record the results of the observer's inspection of the cyclones and cyclone baghouse and provide documentation in records according to the content and format listed below:

- Date of observation
- Time of observation

- Equipment/emission point observed
- Results of visible emission test

The permittee must record the results of each visible emissions evaluation performed on the cyclones and cyclone baghouse emissions stack according to the standard requirements for recordkeeping of monitoring information. The record must be maintained in accordance with General Provision 30.

5.3.3.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report.

5.3.4 Permit Requirement – Throughput (PTC No. 021-00002, 10/26/99)

PTC No. 021-00002 states that the throughput to the planers shall not exceed 219 MMbdf/yr.

5.3.4.1 Compliance Demonstration Method

Monitoring and recordkeeping of throughput.

5.3.4.2 Monitoring and Recordkeeping

The permittee shall monitor and record the throughput to the planers monthly and annually.

5.3.4.3 Testing

There are no testing requirements for this throughput requirement.

5.3.4.4 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report. A certification of the compliance status must be submitted annually.

5.4 EUG 4 - WOOD BYPRODUCT HANDLING and STORAGE

The sources in EUG 4 can contribute to particulate emissions from the handling of wood and wood by-products or through general plant activities. These emissions units do not vent through a stack or have any pollution control equipment attached.

Table 5.4 Emissions Units and Emissions Control Devices

Emissions Unit(s)/Process(es)	Emission Control Device
Hogged bark conveying and loadout	None
Sawdust conveying and loadout	None
Sawmill chips conveying and loadout	None

5.4.1 Permit Requirement - Process Weight - (IDAPA 58.01.01.701 and 702)

IDAPA 58.01.01.701 states: "a person shall not discharge into the atmosphere from any source operating on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:"

- a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

IDAPA 58.01.01.702 states: "a person shall not discharge into the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:"

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

A process-weight rate PM emission limitation is a "moving scale" requirement. The affected emissions units must comply with an allowable PM emissions limit that corresponds to the weight (including the water content) of the material being processed by the group of affected equipment.

5.4.1.1 Compliance Demonstration Method

EPA's guidance on periodic monitoring states that "...if some level of control is necessary to comply with the standard, then the permit must either specify frequent measurement of particulate matter and/or collection of control equipment parameters to assure proper operation and maintenance of the control device." EPA criteria are considered for the development of adequate monitoring and recordkeeping requirements for the facility's compliance certification.

The permittee shall conduct weekly observances of visible emissions from the bins. Continuous compliance may be established through the weekly visible emission inspection program. Generally, the process weight rule is not very stringent, so an intensive program that demonstrates compliance with the opacity limit should also ensure compliance with the process weight rule.

5.4.1.2 Monitoring

The permittee shall conduct a monthly inspection of fugitive emission sources, during daylight hours, during truck bin loadouts, and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable.

5.4.1.3 Testing

There are no testing requirements for the permittee to perform for determining compliance with the particulate matter limitation.

5.4.1.4 Recordkeeping

The permittee shall maintain records of the results of each monthly fugitive emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date of the corrective action was taken.

5.4.1.5 Reporting

The permittee must submit certified semi-annual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semi-annual report. A certification of the compliance status must be submitted annually.

5.5 EUG 5 - DEBARKING AND BARK HOG

The sources in Emission Unit Group 5 do not vent through a stack or have any pollution control equipment attached.

Table 5.5 Emissions Units and Emissions Control Devices

Emissions Unit(s)/Process(es)	Emission Control Device
Debarking of logs	None
Bark hog	None

5.5.1 Permit Requirement - Process Weight - (IDAPA 58.01.01.701)

Permit Requirement - Process Weight - (IDAPA 58.01.01.701 and 702)

IDAPA 58.01.01.701 states: "a person shall not discharge into the atmosphere from any source operating on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:"

- a. If PW is less than 9,250 lb/hr,
$$E = 0.045(PW)^{0.60}$$
- b. If PW is equal to or greater than 9,250 lb/hr,
$$E = 1.10(PW)^{0.25}$$

IDAPA 58.01.01.702 states: "a person shall not discharge into the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:"

- a. If PW is less than 17,000 lb/hr,
$$E = 0.045(PW)^{0.60}$$
- b. If PW is equal to or greater than 17,000 lb/hr,
$$E = 1.12(PW)^{0.27}$$

A process-weight rate PM emission limitation is a "moving scale" requirement. The affected emissions units must comply with an allowable PM emissions limit that corresponds to the weight (including the water content) of the material being processed by the group of affected equipment.

5.5.1.1 Compliance Demonstration Method

EPA's guidance on periodic monitoring states that "...if some level of control is necessary to comply with the standard, then the permit must either specify frequent measurement of particulate matter and/or collection of control equipment parameters to assure proper operation and maintenance of the control device." EPA criteria are considered for the development of adequate monitoring and recordkeeping requirements for the facility's compliance certification.

The permittee shall conduct weekly observances of visible emissions from the debarking operations. Continuous compliance may be established through the weekly visible emission inspection program. Generally, the process weight rule is not very stringent, so an intensive program that demonstrates compliance with the opacity limit should also ensure compliance with the process weight rule.

5.5.1.2 Monitoring

The permittee shall conduct a monthly fugitive emission inspection of fugitive emission sources, during daylight hours under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable.

5.5.1.3 Testing

There are no testing requirements for the permittee to perform for determining compliance with the particulate matter limitation.

5.5.1.4 Recordkeeping

The permittee shall maintain records of the results of each monthly fugitive emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date of the corrective action was taken.

5.5.1.5 Reporting

The permittee must submit certified semiannual reports of all required monitoring listed above. Deviations are to be noted by the permittee and the corrective action(s) taken must be included in the semiannual report. A certification of the compliance status must be submitted annually.

6. INSIGNIFICANT ACTIVITIES

Listed below are the insignificant activities described by the source in accordance with IDAPA 58.01.01.317.

Table 6.1 Insignificant Activities

Emissions Unit Description	Insignificant Activities IDAPA Citation Section 317.01(b)(i)
Sawmill	30
Sawmill screen	30
Sawmill chipper, indoors	30
Planer hog	30
Planer chipper screen (classifier), indoors	30
Planer chip bin loadout	30
Fire water pump with diesel motor	6
Small gas-fired generators	6
Storage tanks with lids or closure < 260 gal	1
Storage tanks < 1,100 gal, no HAPs, maximum vapor pressure 550 mmHg.	2
VOC storage tank < 10,000 gal, with lid or closure, vapor pressure < 80 mmHg at 21 degrees Celsius; and gasoline storage tanks with lid or closure < 10,000 gal	3
Butane, propane and LPG storage tank < 40,000 gal	4
Combustion source < 0.5 MMBtu/hr fired with either kerosene, No.1 and 2 fuel oil.	7
Waste paper incinerator < 0.5 MMBtu/hr	8
Welding < 1 ton per day of welding rod	9
Printing using less than 2 gal of ink.	12
Surface coating, containing less than 1% by weight VOCs	25

7. ALTERNATIVE OPERATING SCENARIOS

There are no alternative operating scenarios identified by the facility.

8. TRADING SCENARIOS

No emissions trading were requested in the permit application.

9. EXCESS EMISSIONS

The facility has not reported any excess emissions scenarios in the Tier I operating permit application.

10. COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

10.1 Compliance Plan

LP certified compliance with all applicable requirements. No compliance plan was submitted.

10.2 Compliance Certification

LP will be required to periodically certify compliance in accordance with General Permit Provision 21.

11. HAZARDOUS AIR POLLUTANTS

The only HAPs emanating from the facility identified in the application are from the gas-fired boilers. Only formaldehyde exceeded the screening emission levels in IDAPA 58.01.01.585 or 586. The SCREEN model was run and the acceptable ambient concentration for carcinogens (AACC) in IDAPA 58.01.01.586 was not exceeded.

12. CHEMICAL ACCIDENT PREVENTION (49 CFR 68)

Any facility that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, must comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR 68 no later than the latest of the following dates:

- Three (3) years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date that a regulated substance is first present above a threshold quantity in a process.

This facility is not currently subject to the requirements of 40 CFR 68. However, should the facility ever become subject to the requirements of 40 CFR 68 then it must comply with the provisions contained in 40 CFR 68 by the time listed above.

13. AFFECTED STATES NOTICE AND REVIEW

The states of Washington and Montana are within 50 miles of the facility and are "affected states" as defined by IDAPA 58.01.01.008.02. Both states were sent a copy of the public comment package. No comments were received.

14. AIRS DATABASE

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A - Attainment U - Unclassifiable N - Nonattainment
SO ₂	B						U
NO _x	B						U
CO	B						U
PM ₁₀	B						U
PT (Particulate)	B		B				U
VOC	A					A	U
THAP (Total HAPs)	B						
			APPLICABLE SUBPART				
			DC				

15. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees, in accordance with IDAPA 58.01.01.525, apply.

16. RECOMMENDATION

Based on the Tier I application and review of the federal regulations and state rules, staff recommends that DEQ issue final Tier I operating permit No. 021-00002 to Louisiana-Pacific for their Bonners Ferry facility.

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cc: DEQ State Office
Coeur d'Alene Regional Office
L. Kral, EPA Region X